

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re)	
)	
Service Electric Cable Television, Inc.)	Docket No. 13-68
)	
For Modification of the)	File No. CSR-8772-A
Philadelphia, PA Designated Market Area)	
With Regard to Television Station)	
WACP, Atlantic City, NJ)	

To: The Chief, Media Bureau

REPLY TO
OPPOSITION TO PETITION FOR SPECIAL RELIEF

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April 18, 2013

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Service Electric Cable Television, Inc. ("Service Electric"), by counsel and pursuant to § 76.7(c) of the Commission's Rules, 47 C.F.R. § 76.7(c), hereby respectfully replies to the Opposition filed on April 8, 2013 by Western Pacific Broadcast, LLC ("Western Pacific") to Service Electric's Petition for Special Relief, in which it had demonstrated its entitlement to a modification of the Philadelphia, Pennsylvania Designated Market Area ("DMA") for purposes of the Commission's mandatory carriage rules by excluding the cable communities listed on an attached Appendix (the "Communities") from the television market of station WACP, Channel 4, Atlantic City, New Jersey ("WACP").

The following is shown in reply to Western Pacific's Opposition:

I. Introduction and Summary

Western Pacific seeks to make a mockery of the must carry provisions of the Communications Act. The legislative history of the Cable Television Consumer Protection and

Competition Act of 1992 (Cable Act)¹ makes it clear that the must carry rules were adopted to preserve locally-oriented programming. Its purpose is the “preservation of local television service and the local public interest programming provided by these broadcast stations.”² The legislative history makes it clear that the FCC may make adjustments to include or exclude particular communities from a television station’s market “consistent with Congress’ objective to ensure that television stations be carried in the areas which they serve and which form their economic market.”³

WACP is not local to Service Electric’s cable systems. The only carriage in or near Service Electric’s systems occurred as the result of the settlement of must carry complaints which does not constitute historical carriage.⁴ The station provides no predicted service over most of Service Electric’s systems and where a community is supposedly within WACP’s protected contour there is no actual signal available in the community.⁵ The closest community is 87 miles from WACP’s city of license and 60 miles from its transmitter site.⁶ Western Pacific has provided no evidence that any of its programming addresses any issue local to the communities served by Service Electric. In other words, WACP has no physical presence in the communities other than pursuant to forced carriage, has no programming relevant to the communities, and has no nexus at all to the communities. Western Pacific is seeking to convert a purely local Atlantic City television station into a regional ‘super station’ that must be automatically carried in every single community in the DMA. The must carry rules were not designed to permit the formation of a regional super station through forced carriage throughout

¹ 47 U.S.C § 151 *et seq.*

² *Home Shopping Station Issues*, 8 FCC Rcd 5321, 5326 (1993)

³ *Massillon Cable TV, Inc.*, 26 FCC Rcd 15221 (2011) at ¶ 3, *citing* H.R. No. 628, 102 Cong. 2d Sess. 97 (1992)

⁴ *See* Section V, *infra*.

⁵ *See* Section III, *infra*.

⁶ *See* Section II.A, *infra*.

the DMA.⁷ More to the point, the FCC has already determined that the Service Electric communities are not properly in the DMA of a station licensed to Atlantic City because the communities are so far removed from the station that they cannot be deemed to be part of the station's market.⁸

The Service Electric communities are not local to WACP and are properly excluded from the DMA. The points raised in Western Pacific's Opposition do not change this fact. Each point is discussed below.

II. Alleged Substantive Deficiencies

As a threshold matter, Western Pacific claims that the Petition cannot be considered because it does not contain every shred of evidence suggested in § 76.59(b)(1) of the Commission's rules (Opposition at 3-6).⁹ Western Pacific cites no support for its contention.¹⁰ On the contrary, Western Pacific contends that § 76.59(b)(1) is governed by § 76.7(a)(4)(i) of the rules, but that section states that a petition merely "shall state fully and precisely all pertinent facts and considerations relied on to demonstrate the need for the relief requested" Thus,

⁷ *Time Warner Entertainment-Advance Newhouse Partnership* 11 FCC Rcd 6541 (CSB 1996) at ¶ 25.

⁸ *Petition for Modification of Television Stations (FCC 2004)* 19 FCC Rcd 2609 (2004). Service Electric carries WWSI(TV), Atlantic City, as an out of market station pursuant to a retransmission agreement because WWSI(TV) revised its programming schedule to include programming of value to Service Electric's communities.

⁹ Even were that true, Service Electric is constrained to note that, while Western Pacific contends that Service Electric's Petition was deficient for failure to provide all ostensibly required material, Western Pacific's Opposition is itself fatally defective, as it is bereft of the affidavit specifically required by § 76.7(b)(1) of the Commission's rules. While Exhibits A and B to the Opposition are followed by affidavits specific to those materials, the remaining exhibits, as well as the many otherwise unsupported statements, facts and considerations found throughout the Opposition (to cite only a single example, the allegations concerning programming issues found at pp. 21-22), are not supported in any way. By contrast, both Service Electric's Petition and this Reply are supported by general declarations under penalty of perjury.

¹⁰ The sole case mentioned in this section of the Opposition, *KTNC Licensee*, 18 FCC Rcd 16269 (2003), is cited only in support of two subsidiary contentions. In contrast, petitions for special relief which the FCC has dismissed on grounds of insufficiency have omitted numerous relevant categories of information needed to properly assess the reasons presented by the petitioner. See, e.g., *SagamoreHill Broadcasting of Wyoming/Northern Colorado, LLC*, 22 FCC Rcd 12944 (Media Bureau, 2007), in which the only map presented showed the Grade B contour of the station in question, with no map showing terrain, no viewership data and no shopping and labor patterns. *Id.*, at ¶ 3. Even so, the petitioner was merely invited to re-file with additional information. *Id.*, at ¶¶ 4-5.

according to the plain language of § 76.7(a)(4)(i) all that is required is that the petitioner meet its burden by providing evidence sufficient to warrant the relief it seeks.¹¹

In any event, Service Electric has complied with the requirements of 76.59(b). Section 76.59 (b) of the rules provides in pertinent part that a market modification should show:

- (1) A map or maps illustrating the relevant community locations and geographic features, station transmitter sites, cable system headend locations, terrain features that would affect station reception, mileage between the community and the television station transmitter site, transportation routes and any other evidence contributing to the scope of the market.
- (2) Grade B contour maps delineating the station's technical service area and showing the location of the cable system headends and communities in relation to the service areas.
- (3) Available data on shopping and labor patterns in the local market.
- (4) Television station programming information derived from station logs or the local edition of the television guide.
- (5) Cable system channel line-up cards or other exhibits establishing historic carriage, such as television guide listings.
- (6) Published audience data for the relevant station showing its average all day audience (*i.e.*, the reported audience averaged over Sunday-Saturday, 7 a.m.–1 a.m., or an equivalent time period) for both cable and noncable households or other specific audience indicia, such as station advertising and sales data or viewer contribution records.

A. Map Requirement

Maps illustrating the relevant community locations and geographic features, station transmitter sites, cable system headend locations were provided at Exhibits B and C of Service Electric's Petition. Service Electric's headend is located at N40.35'55" W075.25'12".¹² The list of communities was provided at Exhibit A of Service Electric's Petition. To further clarify, attached as **Exhibit 1** hereto is a list of all communities, their coordinates, and their distances

¹¹ Western Pacific's contention that §§ 76.59 (b) and (c) require dismissal of a petition if its "evidentiary showing lacks *any* of the evidence within the 6 enumerated categories of evidence" (Opposition at 6, emphasis added) is a clear misreading of the rule, which requires only that "such evidence" be presented. Rather, consistent with § 76.7(a)(4)(i), and since a petitioner bears the burden of proof, it is apparent that a petitioner is required to submit the evidence that it feels will justify the relief it seeks.

¹² This information previously had been provided to Western Pacific in a carriage request letter of October 1, 2012.

from Atlantic City (WACP's city of license) and from WACP's tower site. Also attached as **Exhibit 2** are two maps which show all of the Service Electric communities and WACP's predicted 28 db contour. Exhibit B to Service Electric's Petition also showed the major transportation routes surrounding the communities. Attached as **Exhibit 3** is an additional map showing the transportation route and distance by car between Atlantic City and the closest Service Electric community, Tinicum Township, PA.¹³

B. Contour Map

The map depicting WACP's protected contour was attached as Exhibit B of Service Electric's Petition. That map also showed the location of Service Electric's headend and the area that contained Service Electric's communities. For greater clarity, the maps attached as **Exhibit 2** show (i) WACP's predicted contour; (ii) all of Service Electric's communities; and (iii) the location of Service Electric's headend.

C. Shopping and Labor Patterns

The available shopping and labor statistics were presented at page 5 of Service Electric's Petition. We note that Western Pacific has provided no evidence to the contrary which shows any relationship between the communities and Atlantic City. Absent any showing from Western Pacific of shopping or labor statistics which link the two areas, the FCC must find that there is no economic nexus between the communities and Atlantic City.¹⁴

D. Television Station Programming

The scant information available about WACP's programming was provided in Service Electric's Petition. It showed absolutely no programming with a nexus to the Service Electric

¹³ As shown thereon, the estimated distance is 113.9 miles and is estimated to require a driving time of **over 2 ½ hours**.

¹⁴ A finding of no nexus is logical given the size of the Philadelphia DMA, the number of other stations licensed to it and the fact that the communities and Atlantic City are at diametrically opposite ends of the DMS.

communities. There is no evidence that WACP provides any programming focused on the local needs and interests of the Service Electric communities. The intent of the must carry rules is to ensure that stations are carried in areas that they serve. While a viewable signal is one indication of service to an area,¹⁵ another is local programming.¹⁶ Where there is no local programming the FCC must find that there is no local service and no local nexus. The Commission has emphasized that in evaluating market modification requests, it is to “afford particular attention to the value of localism” and that key measures to be considered include a station’s provision of local service to a community, other carried stations’ attention to events of local interest, and viewing patterns in local non-cable households.¹⁷ Where a station has no local programming, the local subscribers will *per force* not be denied access to local programming if the cable communities are deleted from the station’s DMA.

It is significant to note that despite the hue and cry raised by WACP over the possible deletion of the Service Electric communities from its DMA, WACP has failed to cite even one program that is of value or interest to the Service Electric communities. Indeed if WACP were of interest to its subscribers, Service Electric surely would seek to carry it.¹⁸

E. Evidence of Historical Carriage

There has been no historical carriage of WACP in the Service Electric systems. This was clearly demonstrated in Service Electric’s Petition.

¹⁵ As will be discussed below, WACP does not provide any viewable over-the-air signal to the communities. The ability of a station to deliver a viewable signal through alternative means is not an indicator of local service. *Comcast Cablevision Corporation of California, Petition for Modification of the DMA Market of Television Broadcast Station KTPF, Farwell, Texas*, 17 FCC Rcd 15626 (MB 2002) at ¶ 12.

¹⁶ *TKR Cable Company, Sussex and Morris Counties, New Jersey*, 12 FCC Rcd 8414 (CSB 1997) at ¶ 4.

¹⁷ *Implementation of the Cable Consumer Protection Act of 1992 (Report & Order – Broadcast Signal Carriage Issues)*, 8 FCC Rcd 2965, 2977 (1993).

¹⁸ Service Electric has already demonstrated this with respect to station WWSI(TV), Atlantic City, which it carries despite having been relieved of any legal obligation to do so. *See* Section IV, *infra*.

F. Published Audience Data

Section 76.59 (b) (6) does list published audience data as one of the elements in a market modification petition. Unfortunately, there is no published audience data which is available to the public concerning WACP. Traditionally this information can be obtained from either the *TV Factbook* or the *Broadcasting and Cable Yearbook*. Both publications for 2013 list WACP as an operating station. However, both state that there is no Nielsen data available. To the extent that such data exists it should be available to WACP. Clearly, if WACP could show significant over-the-air or cable viewership within the Service Electric's communities, such a showing could have been an indicator of a local nexus between the station and the communities. WACP tellingly has failed to provide this information in its Opposition; therefore the FCC must conclude that there is no significant viewership. Instead Western Pacific argues that Service Electric's Petition should be dismissed because Service Electric did not submit data that does not exist. However, the more compelling conclusion is that Service Electric's market modification petition should be granted because of the apparent lack of any local viewership.

III. Provision of Noise-Limited Service to the Communities

WACP argues that its service contour is the strongest indicator of its local market, although it believes that this contour provides only a lower limit on market size.¹⁹

Appendix A of Service Electric's Petition lists 76 communities that it seeks to remove from WACP's DMA. All but 14 of the communities are outside of the WACP predicted 28 dbm contour. For those 62 communities there can be no justification for keeping them within WACP's DMA. All of the communities are far removed from WACP's city of license; the

¹⁹ Opposition at 7. Since its claim to remain part of the DMA fails on all other criteria, Western Electric has shown no basis for extending its reach beyond the protected contour. Moreover, as shown below, even within the protected contour WACP has no right to carriage.

signal has never been carried in any of the communities or nearby communities, except in settlement of a must carry complaint; the station provides no local programming; there are no viewing patterns of WACP in cable or non-cable homes; and the communities' television broadcasting needs are more than met by the other stations in the market. For those 62 communities all of the statutory factors for removal have been met and the market modification therefore should be granted.

The remaining communities lie at the distant fringes of a technically-integrated cable television system. It is not technically feasible for Service Electric to provide WACP to the 14 fringe communities without providing WACP to all 76 communities. The Commission has held that communities at the fringe of technically-integrated system should not drive the carriage obligation of the bulk of the system.²⁰

The communities within the predicted protected contour represent less than 11% of the subscribers to Service Electric's system.²¹ To deny the market modification would, in essence, give WACP free carriage beyond that which it would normally be entitled.²² Such a result would be a perversion of the intent of the must carry rules, and should not be permitted.

Service Electric is aware that the service area of a station is the strongest element in market modifications. However, it is not enough that the communities be within the predicted service area of a station. The signal of the station must actually be viewable in the community before the FCC will determine that the station provides service to the community.

²⁰ *Norwell Television LLC, For Modification of the Boston MA DMA*, 16 FCC Rcd 21970 (CSB 2001) at ¶ 27 and *Armstrong Utilities for Modification of the Philadelphia, PA DMA*, 21 FCC Rcd 13475 (MB 2006) at ¶ 16.

²¹ See **Exhibit 4**, which comprises a table of the Service Electric subscribers within the 14 communities within the WACP noise-limited contour, contrasted with the total number of subscribers to the integrated cable system.

²² *Armstrong Utilities, supra*, at ¶ 16.

In its Petition, Service Electric presented the results of signal strength measurements that documented the lack of a usable signal at its headend.²³ To further evidence the scope of this issue, on April 16, 2013, Service Electric took signal readings in four of the areas that lie the closest to the WACP transmitter site.²⁴ Service Electric was unable to find a viewable signal in any of those areas. Since none of the signals could be viewed off the air in those areas, the FCC must find that there is no physical service available in the communities. When the lack of a viewable signal is added to the fact that these communities are located at the fringes of a technically-integrated system and that WACP provides no local programming, there can be no justification for keeping these communities within WACP's DMA.²⁵

IV. Carriage of Another Atlantic City Station

WACP seeks to be treated the same as the other Atlantic City station, WWSI(TV). WACP argues that it is entitled to the same treatment as WWSI because WWSI and WACP's transmitters are located on the same tower, both are licensed to Atlantic City, and WWSI's predicted contour is smaller than WACP's (Opposition at 16-17). Service Electric does not dispute that the WWSI and WACP transmitters are located on the same tower. Yet Service Electric does not receive WWSI's signal over the air. In fact, WWSI does not place a viewable

²³ Western Pacific characterizes the results of the test conducted by Service Electric at its headend as "bogus," yet the sole deficiency it alleges is that the receive antenna was 50 feet above ground, rather than on a higher nearby tower (Opposition at 19-20). Yet, the standard height prescribed by the FCC for determining a digital television signal contour is a mere 30 feet above ground. (See § 76.686(b)(2) of the FCC's rules; see, also, *Report to Congress – the Satellite Home Viewer Extension and Reauthorization Act of 2004 – Study of Digital Television Field Strength Standards and Testing Procedures*, 20 FCC Rcd 19504 (2005) at ¶ 43; *DBS Broadcast Carriage Report and Order*, 16 FCC Rcd 1918 (2000) at ¶ 72.) The purpose of this standard is not to impose upon cable operators an obligation to obtain a distant signal by any possible means, but rather to assess whether the signal provides adequate service to the area in question. In addition, Western Pacific's own engineer witnessed the test, raised no objection to the methodology, and confirmed the result that no WACP signal could be detected. See Petition at Exhibit H.

²⁴ The methodology and results of the tests are given in **Exhibit 5**.

²⁵ The standard for over-the-air viewership is different for market modifications than for must carry. Under the must carry rules it is sufficient for a station to deliver a viewable signal by alternative means to a system's headend. In contrast, market modifications depend upon actual availability of an over-the-air signal to indicate local service. With no over-the-air viewability there are no indicators of local service. See *Comcast Cable of California, supra*, at ¶ 12.

signal over any part of Service Electric's communities. The only way that Service Electric is able to receive the WWSI signal is by satellite. Thus Western Electric's reliance on *Ackerley Media Group*²⁶ is inapposite. Instead of an indication of local service, the co-location of the two transmitters on the same tower supports *lack* of local service since Service Electric cannot and does not receive its signal from either transmitter. Therefore co-location is not relevant to the present analysis – other than to further indicate the lack of a local nexus.²⁷

Service Electric does not carry WWSI as an in-market station. Rather, once WWSI began carrying programming of value to Service Electric's communities, it entered into a retransmission carriage agreement. Service Electric has repeatedly advised Western Pacific that if WACP began providing programming of local interest, Service Electric would seek to carry the station. Instead Western Pacific has refused to provide any information that indicates, now or in the future, that it will carry any programming of local interest to Service Electric's communities.

In the meantime, if Service Electric were forced to add WACP it will lose 6 MHz of bandwidth which it needs to provide broadband service to its subscribers.²⁸ At the present time, both the Commission and Congress have determined that much of the bandwidth devoted to television broadcast stations would be better used to promote wider adoption of broadband service. Thus if Service Electric's market modification is denied, the FCC will be thwarting its

²⁶ 18 FCC Rcd 16199 (2003)

²⁷ More importantly, the FCC has determined that the Service Electric communities are not part of the Atlantic City DMA because it does not place a protected contour over the communities, Atlantic City is greater than 83 miles from each of the communities and that therefore the communities are so far removed from the DMA that the communities cannot be part of the station's market. *Petition for Modification of Television Markets, supra*, at ¶¶ 13-15. It is further significant that the Media Bureau made only passing mention of transmitter co-location in that decision. Rather, decisional weight was placed upon encompassment of all the subject communities by the station's Grade A contour. No comparable technical level of service is present here.

²⁸ See Service Electric's Opposition to WACP Must Carry Complaint.

broadband policy to favor a broadcast station that refuses to provide any programming of local interest and which has no local nexus.

As more fully described above, to require a system to carry a station with no local programming, no local service, no history of carriage and no local economic nexus would severely disserve the letter and intent of the must carry rules. There is no basis to force Service Electric to add a station of no value to its subscribers at a severe cost to Service Electric and its subscribers.

V. Historical Carriage of WACP

WACP seeks to bootstrap its carriage throughout Northampton, Bucks, Lehigh and Berks counties by claiming historical carriage by RCN, Service Electric Cablevision, and Verizon of Pennsylvania (Opposition at 10-15). What Western Pacific neglects to mention is that the carriage of WACP by all three of these companies came only after must carry complaints were filed and then settled.²⁹

The Commission has consistently held that where a station is carried as a result of a must carry demand there can be no finding of historical carriage.³⁰ The Commission, therefore, should give no credence to WACP's claim of historical carriage when all the instances of alleged carriage by RCN, Service Electric Cablevision and Verizon of Pennsylvania were in settlement of must carry complaints.

VI. Relationship of the Petition to Western Pacific's Must-Carry Complaint

Western Pacific's final contention is a diffuse accusation that Service Electric has acted improperly by using this petition as a "preemptive collateral attack against Western Pacific's

²⁹ Copies of Western Pacific's dismissals of its petitions for special relief by order of carriage are attached as **Exhibit 6**.

³⁰ *TKR Cable*, *supra* at § 16; *Comcast Cablevision of Monmouth*, 11 FCC Rcd 6426 (FCC 1996) at ¶ 25; *Home Link Communications of Princeton*, 13 FCC Rcd 1578 (CSB 1997) at ¶ 17; *Rifkin/Narragansett, South Florida*, 11 FCC Rcd 21090 (CSB 1996) at ¶ 30.

must carry complaint filed against Service Electric” (Opposition at 20). There is nothing improper about consolidation of a must-carry complaint and a market modification petition. Indeed, the FCC’s practice is to dismiss a complaint as moot upon grant of a related petition.³¹

VII. Conclusion

In previously rejecting the demand by WWSI(TV), Atlantic City, for carriage in the Communities, the Bureau emphasized that, in considering requests for market modification, the Communications Act “specifically and unambiguously” required that it “afford particular attention to the value of localism” by “ensuring that a television station is carried in the areas which it serves and which form its economic market.”³² It further emphasized that the must carry rules “were not intended to transform an otherwise local station into a regional ‘super station’ that must be automatically carried in every single community in [a DMA].”³³ As demonstrated in the Petition and herein, WACP provides no meaningful service, either technical or programming, to the subject communities.

³¹ See, e.g., *Frontiervision Operating Partners, L.P.*, 17 FCC Rcd 9332 (2002) at ¶ 28. Indeed, in light of Western Pacific’s professed concern that Service Electric’s Petition should have provided further information concerning the overall situation common to both sets of pleadings, it seems ironic that Western Pacific here seems to assert that the Commission should base its decision solely upon the far less extensive showing presented in its complaint, rather than upon the far more detailed information involved in the subject petition for special relief.

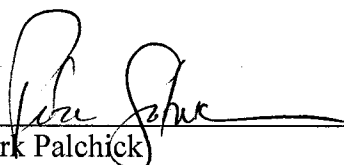
³² *Hispanic Broadcasters of Philadelphia, L.L.C.*, *supra*, 19 FCC Rcd 2609 (2004) at ¶ 13.

³³ *Id.*, citing *Time Warner Entertainment-Advance Newhouse Partnership*, 11 FCC Rcd 6541 (CSB 1996).

Consequently, Service Electric respectfully requests that the Commission modify the WACP(TV) television market as requested.

Respectfully submitted,

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April 18, 2013

Exhibit List

1. List of Communities, Coordinates and Distances From Atlantic City, WACP's City of License, and WACP's Tower Site
2. Maps – Service Electric Communities and WACP Predicted 28 db Contour
3. Map showing Transportation Route Distance by Car Between Atlantic City and the Closest Service Electric Community
4. Table of Service Electric Subscribers Within the 14 Communities Within WACP Noise-Limited Contour
5. Signal Test
6. Western Pacific Dismissals of Petitions for Special Relief

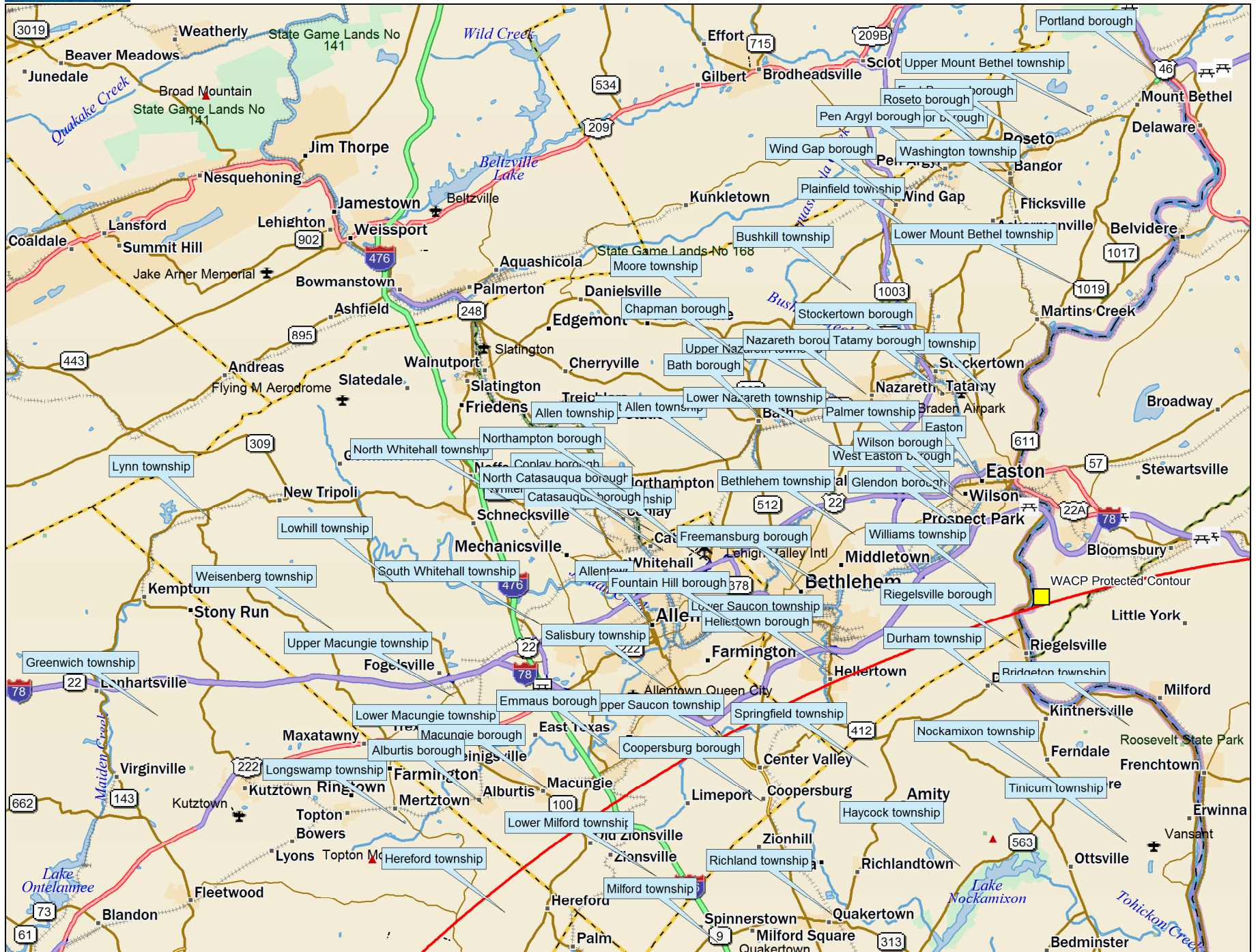
Exhibit 1

Unit	County	Community	Coordinates	Distance from 39° 44' 05" N, 74° 50' 29" W	Distance from Atlantic City 39° 21' 32" N, 74° 25' 53" W
PA0092	NORTHAMPTON	BETHLEHEM	40° 37' 33" N 75° 22' 15"	67.6	100.7
PA0097	NORTHAMPTON	EASTON	40° 41' 18" N 75° 13' 16"	68.9	100.9
PA0098	NORTHAMPTON	FORKS	40° 45' 06" N 75° 13' 59" W	73.2	105.1
PA0099	NORTHAMPTON	GLENDON	40° 39' 58" N 75° 14' 11"	67.6	99.8
PA0108	NORTHAMPTON	PALMER	40° 43' 00" N 75° 14' 58" W	71.2	103.3
PA0109	NORTHAMPTON	PLAINFIELD	40° 50' 00" N 75° 15' 59" W	79.1	111
PA0112	NORTHAMPTON	STOCKERTON	40° 45' 14" N 75° 15' 45" V	73.8	105.9
PA0117	NORTHAMPTON	WILLIAMS	40° 38' 0" N, 75° 13' 59"	65.4	97.7
PA0118	NORTHAMPTON	WILSON	40° 41' 2" N 75° 14' 32" V	68.9	101.1
PA0195	NORTHAMPTON	BANGOR	40° 51' 56" N 75° 12' 25"	80.5	111.9
PA0198	NORTHAMPTON	ROSETO	40° 52' 50" N 75° 12' 54"	81.6	113
PA0250	NORTHAMPTON	LOWER NAZARETH	40° 42' 30" N 75° 22' 36" W	72.9	105.8
PA0251	NORTHAMPTON	NAZARETH	40° 44' 25" N 75° 18' 36"	73.7	106.1
PA0252	NORTHAMPTON	WILLIAMS	40° 38' 00" N 75° 13' 59" W	65.4	97.7
PA0254	NORTHAMPTON	TATAMY	40° 44' 27" N 75° 15' 27"	72.9	105
PA0255	NORTHAMPTON	UPPER NAZARETH	40° 43' 30" N 75° 22' 30" W	74	106.8
PA0413	NORTHAMPTON	PORTLAND	40° 55' 23" N 75° 5' 49" V	83.2	113.6
PA0479	NORTHAMPTON	BETHLEHEM	40° 37' 33" N 75° 22' 15"	67.6	100.7
PA0863	NORTHAMPTON	HELLERTOWN	40° 34' 46" N 75° 20' 28"	64	97.1
PA0864	NORTHAMPTON	LOWER SAUCON	40° 38' 00" N 75° 16' 59" W	66.3	98.9
PA0865	NORTHAMPTON	HANOVER	40° 41' 0" N, 75° 22' 59"	71.5	104.4
PA0920	NORTHAMPTON	UPPER MOUNT BET	40° 52' 00" N 75° 07' 59" W	79.7	110.6
PA0921	NORTHAMPTON	PEN ARGYL	40° 52' 7" N 75° 15' 19" V	81.3	113
PA0922	NORTHAMPTON	WASHINGTON	40° 50' 0" N, 75° 11' 59"	78.2	109.7
PA00924	NORTHAMPTON	PLAINFIELD	40° 50' 00" N 75° 15' 59" W	79.1	111
PA0923	NORTHAMPTON	WIND GAP	40° 50' 53" N 75° 17' 31"	80.5	112.5

Unit	County	Community	Coordinates	Distance from 39° 44' 05" N, 74° 50' 29" W	Distance from Atlantic City 39° 21' 32" N, 74° 25' 53" W
PA0951	NORTHAMPTON	BUSHKILL	40° 44' 59" N, 75° 20' 29"	74.9	107.5
PA0952	NORTHAMPTON	PALMER	40° 43' 00" N 75° 14' 58" W	71.2	103.3
PA1028	NORTHAMPTON	FREEMANSBURG	40° 37' 35" N 75° 20' 46"	67.1	100.1
PA1342	NORTHAMPTON	EAST ALLEN	40° 42' 30" N 75° 24' 59" W	74.8	106.8
PA1368	NORTHAMPTON	MOORE	40° 44' 59" N, 75° 24' 59"	76.4	109.3
PA1974	NORTHAMPTON	BATH	40° 43' 32" N 75° 23' 40"	74.4	107.3
PA2528	NORTHAMPTON	ALLEN	40° 42' 30" N, 75° 30' 0"	75.7	109
PA2709	NORTHAMPTON	NORTH CATASAUQUA	40° 39' 35" N 75° 28' 38"	72.2	105.5
PA3225	NORTHAMPTON	CHAPMAN	40° 45' 42" N, 75° 24' 15"	76.9	109.7
PA0289	LEHIGH	EMMAUS	40° 32' 13" N, 75° 29' 45"	65.3	99
PA0290	LEHIGH	MACUNGIE	40° 30' 57" N 75° 33' 20"	65.8	99.7
PA0291	LEHIGH	LOWER MACUNGIE	40° 32' 51" N 75° 33' 58" W	68	101.8
PA0293	LEHIGH	SALISBURY	40° 34' 46" N 75° 30' 09" W	68	101.6
PA0294	LEHIGH	UPPER MILFORD	40° 31' 00" N 75° 28' 59" W	63.8	97.5
PA0478	LEHIGH	ALLENTOWN	40° 36' 30" N 75° 29' 26"	69.4	102.9
PA0854	LEHIGH	ALBURTIS	40° 30' 39" N 75° 36' 12"	67	100.9
PA0855	LEHIGH	COOPERSBURG	40° 30' 37" N 75° 23' 24" W	60.9	94.4
PA0856	LEHIGH	SALISBURY	40° 34' 46" N, 75° 30' 9"	68	101.6
PA0857	LEHIGH	WHITEHALL	40° 40' 0" N, 75° 30' 0" W	73.2	106.6
PA858	LEHIGH	SOUTH WHITEHALL	40° 37' 31" N 75° 32' 29" W	71.8	105.4
PA0859	LEHIGH	UPPER MACUNGIE	40° 34' 46" N 75° 37' 00" W	71.3	105.1
PA860	LEHIGH	UPPER SAUCON	40° 29' 30" N 75° 24' 59" W	60.5	94.1
PA0861	LEHIGH	CATASAUQUA	40° 39' 17" N 75° 28' 30"	71.8	105.2
PA0867	LEHIGH	FOUNTAIN HILL	40° 36' 5" N 75° 23' 44" W	66.6	99.9
PA1336	LEHIGH	LOWER MILFORD	40° 30' 30" N 75° 27' 29" W	62.6	96.2
PA1373	LEHIGH	WEISENBERG	40° 35' 6" N 75° 43' 36" W	75	109

Unit	County	Community	Coordinates	Distance from 39° 44' 05" N, 74° 50' 29" W	Distance from Atlantic City 39° 21' 32" N, 74° 25' 53" W
PA1374	LEHIGH	LOW HILL	40° 37'26"N 75° 37'25"W	74	107.8
PA1378	LEHIGH	NORTH WHITEHALL	40° 37'27"N 75° 37'25"W	74	107.8
PA1674	LEHIGH	HANOVER	40° 39' 42" N 75° 24' 46"	70.8	103.9
PA2111	LEHIGH	COPLAY	40° 40' 12" N 75° 29' 45"	73.3	106.7
PA2220	LEHIGH	LYNN	40° 40' 6" N, 75° 52' 35"	84.5	118.4
PA0253	BUCKS	RIEGELSVILLE	40° 35' 39" N 75° 11' 45"	62.3	94.4
PA0256	BUCKS	BRIDGETON	40° 33'29"N 75° 06'37"W	58.6	90.3
PA0866	BUCKS	SPRINGFIELD	40° 32' 00" N 75° 17'29"W	60.1	93
PA0948	BUCKS	TINICUM	40° 30'30"N 75° 07'35"W	55.5	87.5
PA1970	BUCKS	NOCKAMIXON	40° 29'30"N 75° 10'59"W	55.3	88
PA2059	BUCKS	DURHAM	40° 34' 32" N 75° 13' 25"	61.5	93.9
PA3452	BUCKS	MILFORD	40° 25'13"N 75° 24'20"W	56	89.7
PA2305	BERKS	GREENWICH	40° 35'00"N 75° 52'59"W	80.4	114.3
PA2662	BERKS	LONGSWAMP	40° 29' 53" N 75° 39' 19"	68	102
PA2745	BERKS	HEREFORD	40° 26'00"N 75° 37'35"W	63.6	97.6

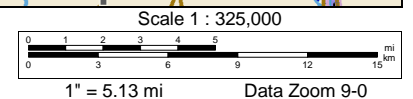
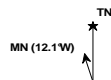
Exhibit 2

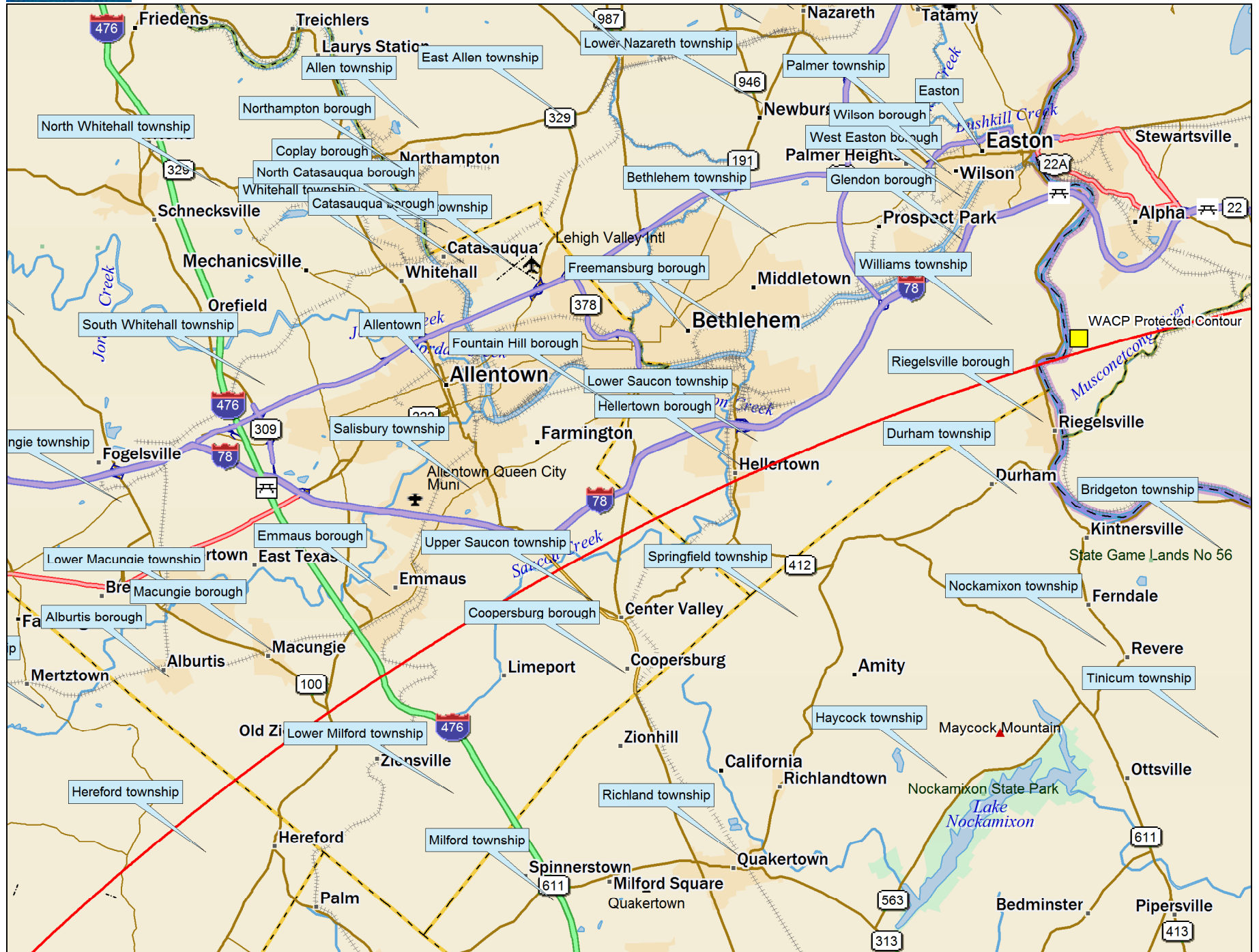


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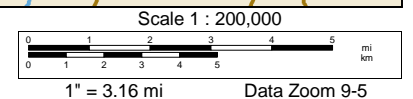
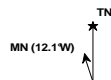


Exhibit 3

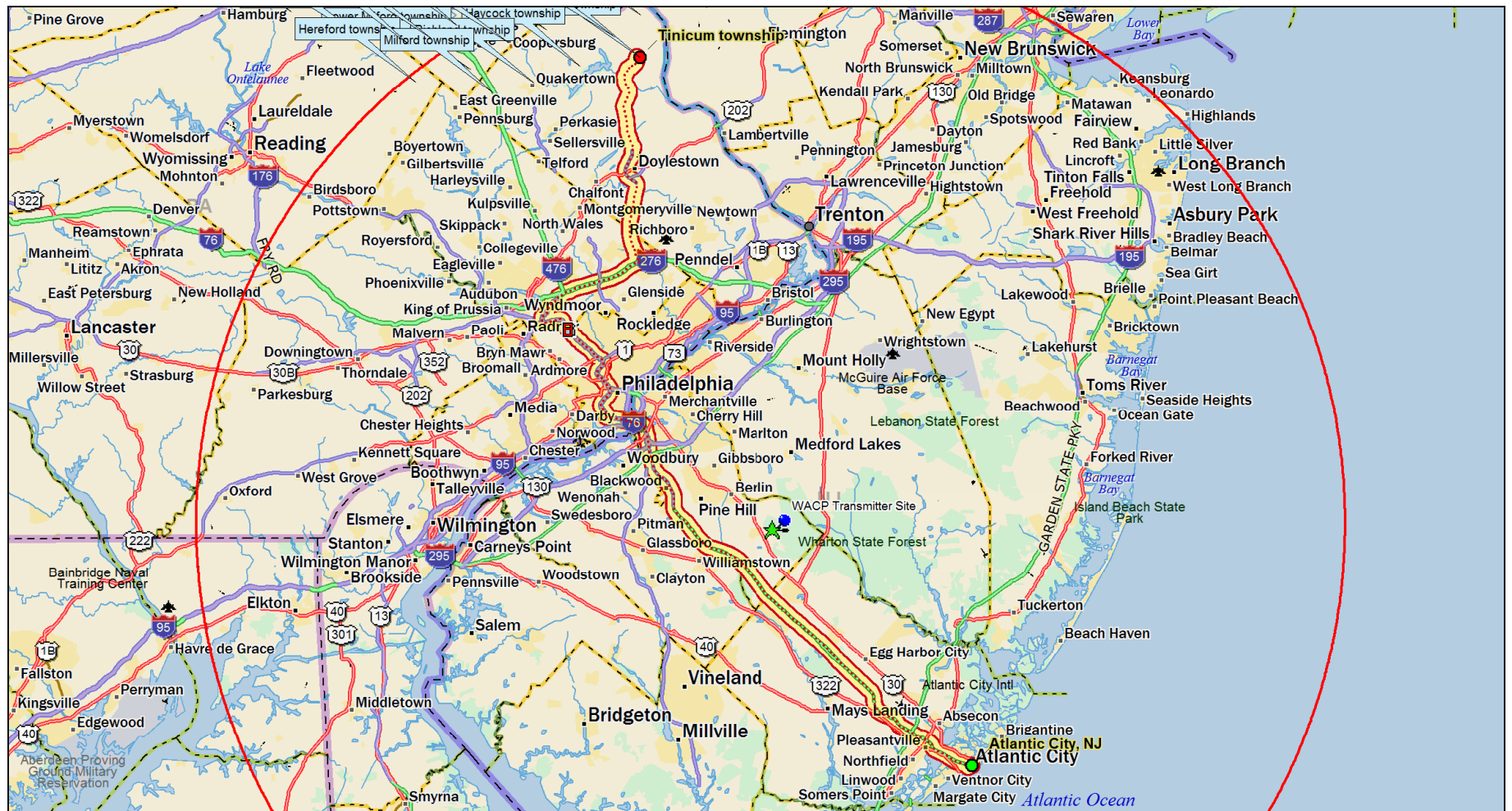


Exhibit 4

COUNTY	COMMUNITY	SUBS
Bucks	Riegelsville, Boro of	135
Bucks	Bridgeton, Township of	266
Lehigh	Coopersburg, Boro of	486
Lehigh	Upper Saucon, Township of	2,987
Northampton	Hellertown, Boro of	960
Bucks	Springfield, Township of	1,027
Bucks	Tinicum, Township of	617
Lehigh	Lower Milford, Township of	926
Bucks	Nockamixon, Township of	667
Bucks	Durham, Township of	230
Bucks	Haycock, Township of	224
Bucks	Richland, Township of	19
Berks	Hereford, Township of	452
Bucks	Milford, Township of	52

TOTAL	9,048
-------	-------

TOTAL PENNSYLVANIA SUBSCRIBERS	82,752
--------------------------------	--------

Exhibit 5

DECLARATION UNDER PENALTY OF PERJURY

Jeffery J. Kelly states under penalty of perjury that the following is true and correct of my personal knowledge and belief:

1. I am the Director of Engineering of Service Electric Cable Television, Inc.
2. The four attached Signal Test reports accurately reflect the methodology and results of tests that I conducted on April 16 to determine the signal strength of station WACP, channel 4.1, Atlantic City at four locations which I considered representative of the region served by our integrated cable television system that lies within the WACP protected contour.



Jeffery J. Kelly

April 18, 2013

Service Electric Cable TV Inc .

Signal Test for WACP TV 4.1

Test 1 location 4710 Kintersville Road ,Kintersville PA

Lat: 40.31'.13"N 75.12'.4"W AMSL 581 ft

DATE: April 16 2013 1:00 pm

Conducted by Jeff Kelly, Director of Engineering and Chris Kelly, Senior Engineer

Test Equipment Blonder Tongue BRY-LP-LB Low band Antenna at 30 feet above ground level on bucket truck.

Sunrise Telcom AT2500 RQV Spectrum Analyzer S/N US83706-0609 Last date of Calibration March 2013

Sharp 19" digital TV S/N 805994183 Purchased December 2012

KTech DVM-150 E S/N DVMARDND 0611-05 Purchased November 2006

We first set the Low band antenna towards the WACP tower.

We hooked up the antenna cable to Spectrum analyzer, set the center Freq to 69.0 Mhz. Span 50 mhz signal was -67. detected, but we did detect channel 6 -37-.

Secondly, we hooked up the low band antenna to the Sharp 19" TV . TV Digital. It decoded 6.1, 6.2 and 6.3 We then manually put in 4.1 into the tuner very weak and spotty channel 4.

Lastly, we hooked up the Low Band antenna to the K-Tech 150 Receiver. We selected RF channel 4. It said we had an input of -66.1. dbm on the input but no solid carrier lock. We then put in channel 6 and got a carrier lock and input signal of -37.2 dbm.

Service Electric Cable TV Inc .

Signal Test for WACP TV 4.1

Test location Tower Road Harrow,PA

Lat: 40.29'16.4"N. 075.10'39.7"W AMSL 498 ft

DATE: April 16 2013 2:05 pm

Conducted by Jeff Kelly, Director of Engineering and Chris Kelly, Senior Engineer

Test Equipment Blonder Tongue BRY-LP-LB Low band Antenna at 30 feet above ground level on bucket truck.

Sunrise Telcom AT2500 RQV Spectrum Analyzer S/N US83706-0609 Last date of Calibration March 2013

Sharp 19" digital TV S/N 805994183 Purchased December 2012

KTech DVM-150 E S/N DVMARDND 0611-05 Purchased November 2006

We first set the Low band antenna to 153° True and 165° degrees Magnetic toward the WACP tower.

We hooked up the antenna cable to Spectrum analyzer, set the center Freq to 69.0 Mhz. signal was -67. detected, but we did detect channel 6 -37-.

Secondly, we hooked up the low band antenna to the Sharp 19" TV . TV Digital. It decoded 6.1, 6.2 and 6.3 We then manually put in 4.1 into the tuner very weak and spotty channel 4.

Lastly, we hooked up the Low Band antenna to the K-Tech 150 Receiver. We selected RF channel 4. It said we had an input of -63.7. dbm on the input but no solid carrier lock. We then put in channel 6 and got a carrier lock and input signal of -37.28 dbm.

Service Electric Cable TV Inc .

Signal Test for WACP TV 4.1

Test 3 location , Saint Peters Road Seisholtzville,PA

Lat: 40.28.13 N 75.36.13W AMSL 856. ft

DATE: April 16 2013 3:30 pm

Conducted by Jeff Kelly, Director of Engineering and Chris Kelly, Senior Engineer

Test Equipment Blonder Tongue BRY-LP-LB Low band Antenna at 30 feet above ground level on bucket truck.

Sunrise Telcom AT2500 RQV Spectrum Analyzer S/N US83706-0609 Last date of Calibration March 2013

Sharp 19" digital TV S/N 805994183 Purchased December 2012

KTech DVM-150 E S/N DVMARDND 0611-05 Purchased November 2006

We first set the Low band antenna towards the WACP tower.

We hooked up the antenna cable to Spectrum analyzer, set the center Freq to 69.0 Mhz. Span 50 mhz signal was -60.0. detected, but we did detect channel 6 -37-.

Secondly, we hooked up the low band antenna to the Sharp 19" TV . TV Digital. It decoded 6.1, 6.2 and 6.3 We then manually put in 4.1 into the tuner very weak and spotty channel 4.

Lastly, we hooked up the Low Band antenna to the K-Tech 150 Receiver. We selected RF channel 4. It said we had an input of -60.0. dbm on the input but no solid carrier lock. We then put in channel 6 and got a carrier lock and input signal of -37.2 dbm.

Service Electric Cable TV Inc .

Signal Test for WACP TV 4.1

Test 4 location State Road and Mountain Road Macungie, PA.

Lat: 40.29'.26"N 75.36'.56" AMSL 512. ft

DATE: April 16 2013 4:15 pm

Conducted by Jeff Kelly, Director of Engineering and Chris Kelly, Senior Engineer

Test Equipment Blonder Tongue BRY-LP-LB Low band Antenna at 30 feet above ground level on bucket truck.

Sunrise Telcom AT2500 RQV Spectrum Analyzer S/N US83706-0609 Last date of Calibration March 2013

Sharp 19" digital TV S/N 805994183 Purchased December 2012

KTech DVM-150 E S/N DVMARDND 0611-05 Purchased November 2006

We first set the Low band antenna towards the WACP tower.

We hooked up the antenna cable to Spectrum analyzer, set the center Freq to 69.0 Mhz. Span 50 mhz and no signal was detected, on channel 4 or 6.

Secondly, we hooked up the low band antenna to the Sharp 19" TV . TV Digital. It did not decode either Channels 4 or 6

Lastly, we hooked up the Low Band antenna to the K-Tech 150 Receiver. We selected RF channel 4. It said we had an input of -70. dbm on the input but no carrier lock. We then put in channel 6 also got no lock and input signal of -70 dbm.

Exhibit 6

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Carriage Complaint Against)	
)	
RCN Telecom Services (Lehigh) LLC)	
)	File No. 12-361
)	CSR-8749-M
by)	
)	
Western Pacific Broadcast, LLC)	
)	
With Respect to Carriage Within the)	
Philadelphia, PA Designated Market Area,)	
of Local Commercial Television Station WACP,)	
Licensed to Atlantic City, New Jersey)	


Directed to: The Chief, Media Bureau

**DISMISSAL OF
PETITION FOR SPECIAL RELIEF
BY ORDER OF CARRIAGE**

Western Pacific Broadcast, LLC ("Western Pacific") hereby dismisses its Petition for Special Relief by Order of Carriage filed in the above-captioned proceeding. This dismissal is submitted pursuant to a settlement agreement between the cable operator and Western Pacific.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: 
M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

April 3, 2013

CERTIFICATE OF SERVICE

I, Valerie Amanda, hereby certify that on this 3th day of April, 2013, I caused a copy of the foregoing "Dismissal of Petition for Special Relief By Order of Carriage" to be served via U.S. mail, postage prepaid, and email upon the following entity:

RCN Telecom Services LLC
650 College Road East
Princeton, NJ 08540
Attn: John J. Gdovin
Senior Vice President of Administration
Thomas K. Steel, Jr.
Deborah A. Rankin

Valerie Admana

Valerie Admana

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of:)	
)	
Carriage Complaint Against)	
)	
Service Electric Cablevision, Inc.)	Docket No. 13-14
and)	File No. CSR-8757-M
Service Electric Cable Television, Inc.)	
)	
by)	
)	
Western Pacific Broadcast, LLC)	
)	
With Respect to Carriage Within the)	
Philadelphia, PA Designated Market Area,)	
of Local Commercial Television Station WACP,)	
Licensed to Atlantic City, New Jersey)	

Directed to: The Chief, Media Bureau

**PARTIAL DISMISSAL OF
PETITION FOR SPECIAL RELIEF
BY ORDER OF CARRIAGE**

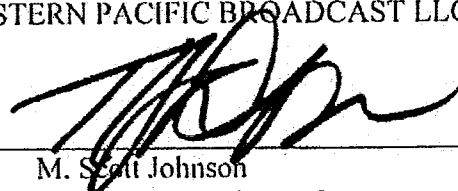
Western Pacific Broadcast, LLC ("Western Pacific") hereby partially withdraws and dismisses with prejudice its Petition for Special Relief by Order of Carriage filed in the above-captioned proceeding insofar as it requests an order of carriage of local commercial television station WACP by Service Electric Cablevision, Inc. This dismissal does not apply to the other

defendant in the proceeding, Service Electric Cable TV, Inc., or its system PSID 001711.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: _____

A handwritten signature in black ink, appearing to read 'M. Scott Johnson', is written over a horizontal line.

M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel


FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

February 14, 2013

CERTIFICATE OF SERVICE

I, Valerie Admana, hereby certify that on February 14, 2013, I caused a copy of the foregoing "Partial Dismissal of Petition for Special Relief by Order of Carriage" to be served via U.S. mail, postage prepaid, and email upon the following person:

Gary Lutzker, Esq.
Dow Lohnes, PLLC
1200 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036-6802



Valerie Admana

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:)	
)	
Carriage Complaint Against)	
)	
Verizon Pennsylvania, Inc.)	Docket No. 12-358
)	File No. CSR-8746-M
by)	
)	
Western Pacific Broadcast, LLC)	
)	
With Respect to Carriage Within the)	
Philadelphia, PA Designated Market Area,)	
of Local Commercial Television Station WACP,)	
Licensed to Atlantic City, New Jersey)	

Directed to: The Chief, Media Bureau

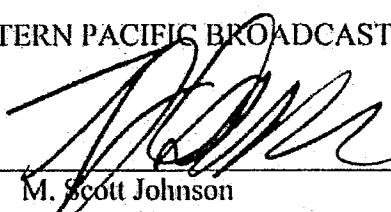
DISMISSAL OF
PETITION FOR SPECIAL RELIEF
BY ORDER OF CARRIAGE

Western Pacific Broadcast, LLC ("Western Pacific") hereby dismisses its Petition for Special Relief by Order of Carriage filed against Verizon Pennsylvania, Inc. in the above-captioned matter.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

By: _____


M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

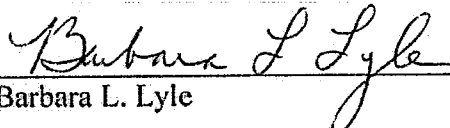
January 4, 2012

CERTIFICATE OF SERVICE

I, Barbara L. Lyle, hereby certify that on this 4th day of January, 2012, I caused a copy of the foregoing "Dismissal of Petition for Special Relief by Order of Carriage" to be served via U.S. mail, postage prepaid, and email upon the following entity:

Verizon
1320 Courthouse Road
Suite 9th Floor
Arlington, VA 22201
Attn: Tonya Rutherford,
Assistant General Counsel
Business & Legal Affairs
Verizon FIOS Television

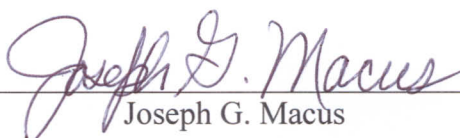
tonya.rutherford@verizon.com


Barbara L. Lyle

DECLARATION UNDER PENALTY OF PERJURY

Joseph G. Macus states under penalty of perjury that the following is true and correct of my personal knowledge and belief:

1. I am the Vice President of Service Electric Cable Television, Inc.
2. I have read the foregoing "Reply to Opposition to Petition for Special Relief" and all the facts stated therein, except those that are supported by separate declarations under penalty of perjury, that are attributed to specific sources, or of which official notice may be taken, are accurate.



Joseph G. Macus

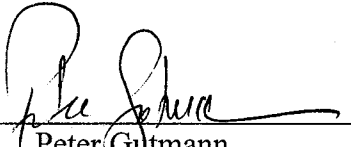
April 18, 2013

CERTIFICATE OF SERVICE

Peter Gutmann, an attorney with the law firm of Womble Carlyle Sandridge & Rice, LLP, does hereby certify that a true and correct copy of the foregoing "Reply to Opposition to Petition for Special Relief" was served by U.S. mail, first class, postage-prepaid on the 18th day of April, 2013, on the following:

M. Scott Johnson, Esq.
Thomas J. Dougherty, Jr., Esq.
Fletcher, Heald & Hildreth
1300 North 17th Street, Suite 1100
Arlington, Virginia 22209
(counsel for Western Pacific Broadcast, LLC)

All Franchising Authorities on the attached list.


Peter Gutmann

M. Scott Johnson, Esq.
Fletcher, Heald & Hildreth
1300 North 17th Street, 11th Floor
Arlington, VA 22209
(counsel for Western Pacific Broadcast, LLC)

Alburtis Borough Hall
730 Franklin St.
Alburtis, PA 18011

Allen Township
4714 Indian Trail Rd.
Northampton, PA 18067

Bangor Borough
197 Pennsylvania Avenue
Bangor, PA 18013-1922

Bath Borough
P.O. Box 37, 215 E. Main St.
Bath, PA 18014

Bethlehem Township
4225 Easton Avenue
Bethlehem, PA 18020

Borough of Emmaus
28 S 4 St.
Emmaus, PA 18049

Borough of Glendon
24 Franklin Street
Easton, PA 18042

Borough of Macungie
21 Locust St.
Macungie, PA 18062

Borough of Stockertown
P.O. Box 174
Stockertown, PA 18083

Borough of West Easton
237 7th Street
Easton, PA 18042

Borough of Wilson
2040 Hay Terrace
Easton, PA 18042

Bridgeton Township
P.O. Box 200
Upper Black Eddy, PA 18972

Bushkill Township
Municipal Building, RD #2
Nazareth, PA 18064

Catasauqua Borough
118 Bridge Street
Catasauqua, PA 18032

Chapman Borough
1400 Main St., Chapman
Bath, PA 18014

City of Allentown
435 Hamilton Street
Allentown, PA 18102

City of Bethlehem
10 E Church St.
Bethlehem, PA 18018

City of Easton
650 Ferry Street
Easton, PA 18042

Coopersburg Borough
5 N Main Street
Coopersburgh, PA 18036

Coplay Borough
2 South Second Street
Coplay, PA 18037

Durham Township
215 Old Furnace Road
Durham, PA 19038

East Allen Township
5344 Nor-Bath Boulevard
Northampton, PA 18067

East Bangor Borough
P.O. Box 328
East Bangor, PA 18013

Forks Township
1606 Sullivan Trail
Easton, PA 18040

Fountain Hill Borough
843 North Clewell Street
Fountain Hill, PA 18015

Freemansburg Borough
600 Monroe Street
Freemansburg, PA 18017

Greenwich Township
RD #1
Lenhartsville, PA 19534

Greenwich Township
775 Old Route 22
Lenhartsville, PA 19534

Hanover Township (Lehigh County)
2202 Grove Road
Allentown, PA 18103

Hanover Township (Northampton County)
38 West market Street
Bethlehem, PA 18018

Haycock Township
RD #3
Quakertown, PA 18951

Hellertown Borough
685 Main Street
Hellertown, PA 18055

Hereford Township
P.O. Box 225
Hereford, PA 18056

Longswamp Township
P.O. Box 37, RD #1
Mertztown, PA 19539

Longswamp Township
1112 State Street
Mertztown, PA 19539

Lower Macungie Township
3400 Brookside Road
Macungie, PA 18062

Lower Macungie Township
3400 Brookside Rd.
Macungie, PA 18062

Lower Milford Township
RD #2, Box 499A
Coopersburgh, PA 18036

Lower Mount Bethel Township
Box 213R
Martin Creek, PA 18083

Lower Mount Bethel Township
Route 611
Martins Creek, Pa 18063

Lower Nazareth Township
728 Walnut Street
Easton, PA 18042

Lower Saucon Township
RD #3
Bethlehem, PA 18015

Lowhill Township
RD #2
New Tripoli, PA 18066

Lynn Township
7911 Kings Highway
New Tripoli, PA 18066

Milford Borough
P.O. Box 86
Spinners Town, PA 18968

Moore Township
2491 Community Drive
Bath, PA 18014

Nazareth Borough
124 Belvidere Street
Nazareth, PA 18064

Nockamixon Townshiip
P.O. Box 100
Ferndale, PA 18921

North Catasaqua Borough
4th and Arch Streets
North Catasaqua, PA 18067

North Whitehall Township
3256 Levans Road
Coplay, PA 18037

Northampton Borough
1401 Laubach Ave.
Northampton, Pa 18067

Palmer Township
3 Weller Place, P.O. Box 3039
Palmer, PA 18045

Pen Argyl Borough Hall
11 N. Robinson Ave.
P.O. Box 128
Pen Argyl, PA 18072

Plainfield Township
6292 Sullivan Trail
Nazareth, PA 18064

Plainfield Township
134 Broadway, Box 147
Bangor, PA 18013

Portland Borough
P.O. Box 47
Portland, PA 18351

Richland Township
1328 California Road
Quakertown, PA 18951

Riegelsville Borough
615 Easton Road
Riegelsville, PA 18077

Roseto Borough
P.O. Box 361
Roseto, PA 18031

Salisbury Township
3000 S. Pike St.
Allentown, PA 18103

Salisbury Township
2900 South Pike Avenue
Allentown, PA 18103

South Whitehall Township
4444 Walbert Avenue
Allentown, PA 18104

Springfield Township
2320 Township Rd.
Quakertown, PA 18951

Tatamy Borough
109 Broadway
Bangor, PA 18013

Tinicum Township
Box 253, Rd #1
Pipersville, PA 18947

Upper Macungie Township
RD #1
Breinigsville, PA 18031

Upper Milford
P.O. Box 210
Old Zionsville, PA 18068

Upper Mount Bethel Township
387 Ye Olde Hwy.
Mount Bethel, PA 18343

Upper Nazareth Township
6 East Lawn Road
Nazareth, PA 18064

Upper Saucon Township
P.O. Box 278, Camp Meeting Rd.
Center Valley, PA 18034

Washington Township
1021 Washington Blvd.
Bangor, PA 18013

Weisenberg Township
Route 1, Box 174
Fogelsville, PA 18051

Whitehall Township
3219 Macarthur Rd.
Whitehall, PA 18052

Williams Township
655 Cider Press Road
Easton, PA 18042

Williams Township
RD #4, P.O. Box 457
Easton, PA 18042

Wind Gap Borough
29 Mechanic Street
Wind Gap, PA 18091